

**UNITED STATES OF AMERICA
IN THE DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ERNEST FLAGG, as Next Friend of
JONATHAN BOND, a minor,
TARIS JACKSON, as Next Friend of
ASHLY JACKSON, a minor,
DR. BRIAN GREENE, as Next Friend of
INDIA BOND, a minor,

Case No.: 05-CV-74253
Hon. Gerald Rosen

Plaintiffs,

-vs-

CITY OF DETROIT, a municipal corporation;
DETROIT POLICE CHIEF ELLA BULLY-CUMMINGS;
DEPUTY DETROIT POLICE CHIEF CARA BEST
JOHN DOE POLICE OFFICERS 1 - 20;
ASST. DEPUTY POLICE CHIEF HAROLD CURETON;
COMMANDER CRAIG SCHWARTZ;
MAYOR KWAME M. KILPATRICK,
CHRISTINE BEATTY, jointly and severally

Defendants.

NORMAN YATOOMA & ASSOCIATES, P.C.

By: Norman A. Yatooma (P54746)
By: Robert S. Zawideh (P43787)
Attorneys for Plaintiffs
219 Elm Street
Birmingham, Michigan 48009
(248) 642-3600

JAMES C. THOMAS

By: James C. Thomas (P23801)
Attorney for Defendant Kilpatrick
535 Griswold Street, Suite 2632
Detroit, Michigan 48226
(313) 963-2420

PLUNKETT COONEY

By: Kenneth L. Lewis (P26071)
By: Said A. Taleb (P66030)
By: Randal M. Brown (P70031)
Attorneys for Defendant Ella Bully-Cummings
535 Griswold, Suite 2400
Detroit, MI 48226
(313) 983-4790

MORGANROTH & MORGANROTH, PLLC

By: Mayer Morganroth (P17966)
By: Jeffrey B. Morganroth (P41670)
Attorneys for Defendant Christine Beatty
3000 Town Center, Suite 1500
Southfield, Michigan 48075
(248) 355-3084

WILLIAMS, WILLIAMS, RATTNER & PLUNKETT

By: Thomas G. Plunkett (P18957)
By: David E. Plunkett (P66696)
Attorneys for Bell Industries, Inc., d/b/a SkyTel
380 N. Old Woodward Avenue, Suite 300
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(248) 642-0333

HONIGMAN MILLER SCHWARTZ & COHN

By: Herschel P. Fink (P13427)
Attorney for Intervenor Detroit Free Press
660 Woodward Avenue, Suite 2290
Detroit, Michigan 48226-3583
(313) 465-7000

MOSS & COLELLA PC

By: David Moss (P36757)
By: Vince Colella (P49747)
Co-Counsel for Plaintiffs Ashly Jackson and
India Bond Only
29100 Northwestern Hwy., Suite 310
Southfield, Michigan 48034
(248) 945-0100

CITY OF DETROIT LAW DEPARTMENT

By: John A. Schapka (P36731)
By: Krystal A. Crittendon (P49981)
Attorneys for Defendants City of Detroit,
Craig Schwartz, Cara Best and Harold
Cureton
660 Woodward Ave, Suite 1650
Detroit, Michigan 48226
(313) 237-3018

PLAINTIFFS' PRELIMINARY WITNESS LIST

1. Former Mayor Kwame Kilpatrick

Can be reached through counsel of record.
2. Carlita Kilpatrick

Uncertain as to contact information and/or Defendants' are already aware of such contact information.
3. Bernard Kilpatrick

Uncertain as to contact information and/or Defendants' are already aware of such contact information.
4. Christine Beatty

Can be reached through counsel of record.
5. Ella Bully – Cummings

Can be reached through counsel of record.
6. Record Custodians, Administrative personnel, and any and all employees, past or present, of Velocita Wireless LLC, f/k/a Bell Industries, Inc. d/b/a SkyTel

7. Record Custodians, Administrative personnel, and any and all employees, past or present, of any predecessor or successor in interest of Velocity Wireless LLC.
8. Cara Best
Can be reached through counsel of record.
9. Craig Schwartz
Can be reached through counsel of record.
10. Harold Cureton
Can be reached through counsel of record.
11. Joyce Rogers
787 Red Run Drive, Troy, MI 48085
12. Pastor Ken Hampton
Grace Bible Chapel, 5440 Oakman Blvd., Detroit, MI 48204
13. Douglas Bayer
Can be contacted through Norman Yatooma & Associates, PC, 219 Elm Street, Birmingham, MI 48009.
14. All City of Detroit EMS personnel that transported Tamara Greene from the murder scene on April 30, 2003.
15. All Detroit EMS personnel that transported Tamara Greene to any medical treatment facility including but not limited to any hospitals on the night of the Manoogian Manson party.
16. Don Bayer
Uncertain as to contact information and/or Defendants' are already aware of such contact information.
17. Fawn Colombatto
Can be contacted through Norman Yatooma & Associates, PC, 219 Elm Street, Birmingham, MI 48009.

18. Tyrone Scott, Executive Fire Commissioner of the Detroit Fire Department
250 West Larned, Detroit, MI 48226
19. Seth R. Doyle, III, Deputy Fire Commissioner of the Detroit Fire Department
250 West Larned, Detroit, MI 48226
20. Cheryl A. Campbell, 2nd Deputy Fire Commissioner of the Detroit Fire Department
250 West Larned, Detroit, MI 48226
21. Gary N. Kelly, Chief Superintendent of EMS, Detroit Fire Department
250 West Larned, Detroit, MI 48226
22. James Kestleloot, Assistant Chief Superintendent of EMS, Detroit Fire Department
250 West Larned, Detroit, MI 48226
23. Joe M. Wilson, Captain, EMS Division – Field Operations
250 West Larned, Detroit, MI 48226
24. Dwayne Dixon, Lieutenant EMS Division – Field Operations
250 West Larned, Detroit, MI 48226
25. Michael Kearns

Can be contacted through Norman Yatooma & Associates, PC, 219 Elm Street,
Birmingham, MI 48009
26. Lt. Alvin Bowman

24329 Leewin, Detroit, MI 48219
27. Walter Godzwon

5240 Harvard Rd., Detroit, MI 48224-2166
28. Bobbie R. Tyler

Uncertain as to contact information and/or Defendants' are already aware of such
contact information.

29. Tony Davis

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

30. Ernest Flagg

Can be reached through counsel of record

31. William Mitchell III

Mitchell Lord & Associates, PLLC, 2000 Town Center, Suite 1000, Southfield, MI 48075

32. Beverly Clark

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

33. Maureen Stevens

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

34. Lewis (Bill) Dickens

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

35. Nicole Darece Wilson

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

36. Barron Strohmeyer

LSS Consulting, 4057 Pioneer Drive, Walled Lake, MI 48390

37. Ned Timmons

LSS Consulting, 4057 Pioneer Drive, Walled Lake, MI 48390

38. Attorney General Michael Cox

Dept. of Attorney General, PO Box 30212, G Mennen Williams Bld., Fl 7, Lansing, MI 48909

39. Dennis Mitchenor

Uncertain as to contact information and/or Defendants' are already aware of such contact information.
40. Carl J. Schmidt, Wayne County Medical Examiner

1300 E. Warren, Detroit, MI 48207
41. Keith Stallworth

Uncertain as to contact information and/or Defendants' are already aware of such contact information.
42. Ashly Jackson

Can be reached through counsel of record
43. Taris Jackson

Can be reached through counsel of record
44. India Bond

Can be reached through counsel of record
45. Dr. Brian Greene

Can be reached through counsel of record
46. Odell Godbold

Uncertain as to contact information and/or Defendants' are already aware of such contact information.
47. Sgt. Mike Russell

Uncertain as to contact information and/or Defendants' are already aware of such contact information.
48. Mike Carlisle
Uncertain as to contact information and/or Defendants' are already aware of such contact information.
49. Bill Rice

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

50. Wedad El-Hage

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

51. Gary Brown

C/O of Mike Stefani at Stefani & Stefani PC, 512 East Eleven Mile, Royal Oak, Mi 48067.

52. All persons identified via SkyTel "personal identification numbers"

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

53. Ajene Evans

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

54. Alice Beatty

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

55. Al Fields

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

56. Andrea Carroll

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

57. Anthony Adams

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

58. Brenda Braceful

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

59. Ceeon Quiett

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

60. Charles Beckham

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

61. Dave Manney

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

62. Dedan Milton

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

63. Derrick Miller

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

64. James Canning

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

65. James Tate

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

66. Kandia Milton

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

67. Lisa Miller

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

68. Lucius Vasser

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

69. Mike Tardiff

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

70. Misty Evans

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

71. Nikki Evans

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

72. Nneka Kafi

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

73. Pamela Scales

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

74. Patricia Peoples

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

75. Ruth Carter

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

76. Cmdr. Shereece Fleming-Freeman, DPD

Uncertain as to contact information and/or Defendants' are already aware of such

contact information.

77. Lt. Billy Jackson

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

78. Former Detroit Police Chief Jerry Oliver

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

79. Paytra Williams, DPD

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

80. Ofc. Lorenzo Jones, DPD

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

81. Ofc. Mike Martin, DPD (EPU officer)

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

82. Janice Butler, Chief of Staff to Chief Ella Bully – Cummings

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

83. Asst. Chief George Hall, DPD

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

84. Asst. Chief Walter Shoulders, DPD

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

85. Cmdr. Todd Bettison, DPD

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

86. Dep. Chief Walter Martin, DPD

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

87. Claudia Barton

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

88. Vivan Talbert

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

89. Gerard Simon

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

90. Walter Long

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

91. Brian Stair, DPD

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

92. Fred McClure, DPD

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

93. Roosevelt Lawrence, DPD

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

94. Pierre Fortier, DPD

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

95. Dave Rayford

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

96. Matt Allen, Defendant Kilpatrick's Former Press Secretary

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

97. Kerwin Wimberley, Defendant Kilpatrick's Liaison to the Detroit City Council

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

98. Pam Evan, DPD

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

99. Det. M. Jimenez, DPD Homicide Unit

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

100. Mark Andre Cunningham

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

101. Sean Werdlow

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

102. Eric Mitchell

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

103. Harold Nelthrop

C/O of Mike Stefani at Stefani & Stefani PC, 512 East Eleven Mile, Royal Oak, Mi 48067.

104. Walter Harris

C/O of Mike Stefani at Stefani & Stefani PC, 512 East Eleven Mile, Royal Oak, Mi 48067

105. Marian Stevenson

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

106. All current and former Executive Protection Unit officers of DPD

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

107. Janice Butler, Chief of Staff to Chief Ella Bully Cummings

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

108. Dep. Chief Charise Fleming-Freeman, DPD

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

109. Asst. Chief George Hall, DPD

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

110. Ron Fleming

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

111. Mike Stefani

Stefani & Stefani PC, 512 East Eleven Mile, Royal Oak, Mi 48067

112. Bobby Ferguson

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

113. Steve Hanna

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

114. Michael Passage

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

115. Brian Green

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

116. Billy Barnwell, Carpenter's Labor Union Official

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

117. Sarah Lile, reappointed City of Detroit Environmental Affairs Director

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

118. Sunday Jaiyesimi, reappointed City of Detroit Engineer

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

119. John Nelson, reappointed City of Detroit Director of Public Housing

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

120. Mildred Kyles, reappointed City of Detroit Neighborhood City Halls Director

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

121. Ron Ruffin, reappointed City of Detroit Director of the Municipal Parking Department

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

122. Ron Kegan, reappointed Director of the Detroit Zoo

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

123. All past or present, Detroit Police Officers and City Employees involved in any aspect of the homicide investigation of Tamara Greene

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

124. All past or present, Detroit Police Officers assigned to Squad 8 at any time that it was assigned the homicide investigation of Tamara Greene

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

125. All past or present, Detroit Police Officers assigned to Cold Case at any time that it was assigned the homicide investigation of Tamara Greene

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

126. All past or present, employees of the Wayne County Medical Examiners office who in anyway participated in the autopsy of Tamara Greene, and the creation, processing and retention of records related to same

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

127. All past or present, criminal investigators in anyway involved in the criminal prosecutions of Defendants Kilpatrick and Beatty

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

128. Records Custodians for:

- A. City of Detroit Human Resources/Personnel Department regarding City and DPD employees employed at relevant times, and job descriptions for relevant city employees, contractors, appointees, administrative and executive personnel, EPU officers, and other relevant job functions;
- B. Detroit Receiving Hospital regarding any records that involve treatment rendered to Tamara Greene or any other exotic dancer on or about the night of the Manoogian Mansion party;
- C. St. John Riverview Hospital regarding any records that involve treatment rendered to Tamara Greene or any other exotic dancer on or about the night of the Manoogian Mansion party;

- D. Health care providers for Tamara Greene during the last five years of her life.
- E. City of Detroit regarding all policies and procedures for the relevant periods that pertain to the City's electronic communications systems, computer systems, hiring, firing and disciplining of personnel, job seniority;
- F. Detroit Police Department regarding
 - i. The Tamara Greene homicide file;
 - ii. The Evidence Technician Unit logs and records;
 - iii. The Evidence Room logs and records;
 - iv. The Dispatch Logs, surveillance video, run sheets from August, 2002 to September, 2002, for precincts providing services of any kind during periods above to the Manoogian Mansion or the location of Tamara Greene's murder;
 - v. The complete Detroit Police Manual for 2002 and 2003;
 - vi. All policies and procedures in place for the relevant time periods governing or relating in anyway to the above matters, homicide and other criminal investigations, record keeping, creation, filing and maintenance of police investigative and incident reports, internal affairs investigations, and cold case investigations;
- G. Michigan State Police Department regarding any investigation of the Manoogian Mansion party, the murder of Tamara Greene, and any attempts by Defendants or those close to them to obstruct, interfere with, or otherwise terminate investigations that are related in any way to Tamara Greene or the Manoogian Mansion party;
- H. Michigan Attorney General's office regarding any investigation of the Manoogian Mansion party, the murder of Tamara Greene, and any attempts by Defendants or those close to them to obstruct, interfere with, or otherwise terminate investigations that are related in any way to Tamara Greene or the Manoogian Mansion party;
- I. Wayne County Medical Examiner's Office regarding the autopsy records of Tamara Greene;
- J. Wayne County Sheriff's Department regarding any investigation of the Manoogian Mansion party, the murder of Tamara Greene, and any attempts by

Defendants or those close to them to obstruct, interfere with, or otherwise terminate investigations that are related in any way to Tamara Greene or the Manoogian Mansion party;

K. Wayne County Prosecutor's Office regarding any investigation of the Manoogian Mansion party, the murder of Tamara Greene, and any attempts by Defendants or those close to them to obstruct, interfere with, or otherwise terminate investigations that are related in any way to Tamara Greene or the Manoogian Mansion party.

129. John Figurski, MSP

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

130. Curtis Schramm, MSP

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

131. Mark Krebbs, MSP

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

132. Dennis Carlos

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

133. Denise Cattron

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

134. Commander Clark

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

135. Kimberly Kimbrough

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

136. Sgt. Martha Sanford

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

137. Sarah Redmond

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

138. Sgt. Joseph Luczak

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

139. Sgt. Alonzo Sandusky

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

140. Comm. Pierre Fortier

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

141. Michael Ziolkowski

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

142. Jerry Schoatz

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

143. Ronaldo Turner

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

144. Inspector Tonya Guy

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

145. Comm. Andrea Jackson

Uncertain as to contact information and/or Defendants' are already aware of such

contact information.

146. Officer Diane Nelson

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

147. Ralph Bellamy

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

148. Marcy Brown

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

149. Jerome Oliver

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

150. Shawn Wesley

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

151. Donald Parshall

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

152. Brian Stair

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

153. Steven Dolnut

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

154. Hugh Morrison

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

155. Wendy Mullins

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

156. Anthony Baker

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

157. David Rayford

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

158. John Johnson

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

159. James Barren

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

160. Asst. Chief Robert Dunlap, DPD

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

161. Deanna Maher

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

162. Gerald Thomas

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

163. Joe Thomas, Southfield Police Chief

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

164. Celeste Bulgar

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

165. Camille Howard

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

166. Cebino Chapa

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

167. Elmwood Berry

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

168. James Earl Lewis

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

169. Sam McCargo

Lewis & Monday PC, 660 Woodward Ave, Ste. 2490, Detroit, MI 48226

170. Robert Schoemaker

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

171. Thomas Bond

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

172. Bertha Johnson

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

173. Christine White

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

174. Brenda Greene

Uncertain as to contact information and/or Defendants' are already aware of such contact information.

175. Jonathan Bond

Can be reached through counsel of record.

176. Records custodians, administrative personnel and any and all employees, past or present, of:

- a. City of Detroit Police Department
- b. Wayne County Medical Examiners Officer
- c. Wayne County Prosecutors Office
- d. City of Detroit Law Department
- e. Wayne County Sheriff's Department
- f. Michigan State Police
- g. City of Detroit Fire Department
- h. City of Detroit Human Resources Department
- i. Michigan Department of Corrections
- j. Sprint/Nextel f/k/a Nextel Communications
- k. Michigan Attorney Generals Office

177. Records custodians, administrative personnel, physicians, nurses and other health care professionals and any and all employees, past or present, of:

- a. Detroit Receiving Hospital
- b. St. John Riverview Hospital

- c. Any hospital, medical walk-in clinic, emergency room, medical emergency facility located in the Wayne/Oakland/Macomb/Washtenaw counties during all relevant time periods pertaining to this action.
- 178. All persons identified or identifiable from the text message logs produced in this case.
- 179. All persons identified or identifiable from the Tamara Greene homicide file produced in this case.
- 180. All persons named on any parties' initial or supplemental Rule 26 disclosures.
- 181. All witnesses necessary to authenticate documents.
- 182. All witnesses appearing on any other party's witness list.
- 183. Any rebuttal witnesses.
- 184. Any surrebuttal witnesses.
- 185. Any new or surprise witnesses disclosed during proofs, trial or hearings.
- 186. Any and all witnesses necessary to rebut testimony introduced by any other party to this litigation.
- 187. Any foundational witnesses necessary to establish and lay foundation to any documents or exhibits.
- 188. Any and all witnesses identified by all parties through the course of Discovery and necessitated by future Discovery, whether called to testify at the time of trial or not.
- 189. All persons identified during Discovery, including in any deposition, interrogatory answers or documents produced.
- 190. Plaintiff reserves the right to elicit expert testimony from an expert witness identified by other parties, regardless of whether called by that party and regardless of whether the party is still in this litigation at the time of trial.
- 191. Plaintiff reserves the right to identify any and all witnesses necessary to respond to those of other parties whose identities have not yet been disclosed to Plaintiff.
- 192. Plaintiff reserves the right to supplement the Witness List with individuals, both lay and expert, as may become necessary during the continuing course of Discovery, up until the time of trial, upon reasonable notice to Defendants.
- 193. Plaintiff reserves the right to modify or supplement the Witness List until the final trial date.

194. Plaintiff reserves the right to amend or correct any misidentification, spelling, or typographical/clerical errors that may be present and are later discovered.

October 17, 2008

/s/ Robert S. Zawideh
Norman Yatooma & Associates, P.C.
Attorneys for Plaintiffs
219 Elm Street
Birmingham, Michigan 48009
(248) 642-3600
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**UNITED STATES OF AMERICA
IN THE DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ERNEST FLAGG, as Next Friend of
JONATHAN BOND, a minor,
TARIS JACKSON, as Next Friend of
ASHLY JACKSON, a minor,
DR. BRIAN GREENE, as Next Friend of
INDIA BOND, a minor,

Case No.: 05-CV-74253
Hon. Gerald Rosen

Plaintiffs,

-VS-

CITY OF DETROIT, a municipal corporation;
DETROIT POLICE CHIEF ELLA BULLY-CUMMINGS;
DEPUTY DETROIT POLICE CHIEF CARA BEST
JOHN DOE POLICE OFFICERS 1 - 20;
ASST. DEPUTY POLICE CHIEF HAROLD CURETON;
COMMANDER CRAIG SCHWARTZ;
MAYOR KWAME M. KILPATRICK,
CHRISTINE BEATTY, jointly and severally

Defendants.

NORMAN YATOOMA & ASSOCIATES, P.C.

By: Norman A. Yatooma (P54746)
By: Robert S. Zawideh (P43787)
Attorneys for Plaintiffs
219 Elm Street
Birmingham, Michigan 48009
(248) 642-3600

JAMES C. THOMAS

By: James C. Thomas (P23801)
Attorney for Defendant Kilpatrick
535 Griswold Street, Suite 2632
Detroit, Michigan 48226
(313) 963-2420

PLUNKETT COONEY

By: Kenneth L. Lewis (P26071)
By: Said A. Taleb (P66030)
By: Randal M. Brown (P70031)
Attorneys for Defendant Ella Bully-Cummings
535 Griswold, Suite 2400
Detroit, MI 48226
(313) 983-4790

MORGANROTH & MORGANROTH, PLLC

By: Mayer Morganroth (P17966)
By: Jeffrey B. Morganroth (P41670)
Attorneys for Defendant Christine Beatty
3000 Town Center, Suite 1500
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CERTIFICATE OF SERVICE

I hereby certify that on October 17, 2008, I electronically filed the following papers with the Clerk of the Court using the CM/ECF system on the following:

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